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8 Attorneys for Plaintiff  
FACEBOOK, INC.

9  
10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN JOSE DIVISION

13 FACEBOOK, INC.,

14 Plaintiff,

15 v.

16 POWER VENTURES, INC. a Cayman Island  
17 Corporation; STEVE VACHANI, an  
individual; DOE 1, d/b/a POWER.COM,  
18 DOES 2-25, inclusive,

19 Defendants.

Case No. 5:08-cv-05780 JW

**DECLARATION OF MORVARID  
METANAT IN SUPPORT OF  
FACEBOOK, INC.'S MOTION TO  
POWER VENTURES, INC. TO  
PRODUCE DOCUMENTS**

Judge: Hon. James Ware  
Courtroom: 8, 4th Floor

1 I, Morvarid Metanat, hereby declare as follows:

2 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe, LLP, counsel  
3 of record to Facebook, Inc. in the above-captioned matter. I make this declaration based on my  
4 personal knowledge, unless otherwise noted. If called, I can and will testify competently to the  
5 matters set forth herein.

6 2. Attached hereto as **Exhibit 1** is a true and correct copy of Facebook's document  
7 production Bates labeled FBPOWER00136.

8 3. Attached hereto as **Exhibit 2** is a true and correct copy of relevant excerpts from  
9 the July 20, 2011, deposition transcript of Defendant Steve Vachani. **[DESIGNATED HIGHLY  
10 CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER – LODGED UNDER SEAL]**

11 4. Attached hereto as **Exhibit 3** is a true and correct copy of Facebook's document  
12 production Bates labeled FBPOWER00063.

13 5. Attached hereto as **Exhibit 4** is a true and correct copy of Facebook's document  
14 production Bates labeled FBPOWER00089.

15 6. Attached hereto as **Exhibit 5** is a true and correct copy of Facebook, Inc.'s First  
16 Set of Requests for Production.

17 7. Attached hereto as **Exhibit 6** is a true and correct copy of Power Venture's  
18 Response to Facebook's First Set of Requests for Production.

19 8. Attached hereto as **Exhibit 7** is a true and correct copy of Power's document  
20 production Bates labeled POWER 2011.02.03 0000023-67. **[DESIGNATED HIGHLY  
21 CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER – LODGED UNDER SEAL]**

22 9. Attached hereto as **Exhibit 8** is a true and correct copy of Power's document  
23 production Bates labeled POWER 2011.02.03 000004-22. **[DESIGNATED HIGHLY  
24 CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER – LODGED UNDER SEAL]**

25 10. Attached hereto as **Exhibit 9** is a true and correct copy of my June 9, 2011, letter  
26 to Mr. Fisher.  
27  
28

1 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
2 knowledge. Executed this 10th day of August 2011 at Menlo Park California.

3  
4 /s/ Morvarid Metanat /s/  
Morvarid Metanat